

## INSTRUCTIONS FOR CENTER REVIEW FORM FOR CHILD CARE CENTERS SPONSORING ORGANIZATIONS ONLY

The center review form is designed to be used by administrative and center sponsors in reviewing their sponsored child care centers. Use the review form for adults if not a child care center. Follow the instructions below when completing a review. Most items answered as “NO” will require a finding and corrective action. Some items answered as a “NO” will only require technical assistance. Both should be documented on the Summary of Findings – page 5. Separate technical assistance items from the findings at the bottom of the form.

**Box:** Record date of review. Circle whether the visit is the first, second, or third of the fiscal year. Check whether the review is unannounced. Record arrival and departure times and the reviewer’s name.

**Name of Center:** Enter the legal name and the name the center is doing business as. Enter the address of the center.

**Licensed Capacity:** Enter the capacity of the center at 35 sq. feet and if applicable the licensed capacity for the two extra hours at 25 sq. feet. For those facilities that are not licensed by Bright from the Start, enter NA for not applicable.

**Number Enrolled:** Enter the number of enrolled participants as indicated on the roster.

**Number Present on Date of Visit:** Enter the number of participants that were present at the time of the visit.

**Eligibility Method:** Check whether the center is a for-profit or non-profit organization.

**Program Type:** Check the type of program operated by the center. If the center operates the both the child care program and the At Risk after School Care Program at the same location, check both programs.

### Licensing/Approval

In order to qualify for the CACFP, child care centers must meet one of the three licensing or approval types.

#### **Licensing Type:**

If the center is licensed by Bright from the Start as a group day care home or child care center, check the DECAL box. If the center is on a military installation and licensed by the Department of Defense, check the DOD box.

**Approval Type:** For Head Start programs that are not licensed in Georgia, check the Head Start Performance Standards. For other child care programs that are not licensed in Georgia, but have been approved by a Federal, State, or local government entity, check this box.

Indicate the authority (government entity or program) under which the center is approved to operate.

**Alternate Licensure:** Child care centers which are not licensed or approved by a Federal, State, or local authority may use the CACFP Child Care standards to qualify. The center or the sponsor may elect to complete the CACFP Child Care standards instrument.

Centers that operate the At Risk after School Care Programs, Outside School Hours Centers, and Emergency/Homeless Shelters **only** are not required by CACFP regulations to be licensed, approved, or meet alternate licensure requirements (compliance with CACFP child Care Standards) and should check the Exempt box.

While these types of centers are not required by CACFP regulations to be licensed, At Risk after School Care Programs and Outside School Hours Centers may be required to either be licensed or have an exemption from licensure in the State of Georgia. These types of centers must also comply with any State and local health and safety standards.

**Approved Meal Types:** Check all the meals the center is approved to claim as stated in the application.

**For each question, check “Yes” if the center is meeting the requirement. Check “No” if the center is not meeting the requirement, or check NA if the item is not applicable. Most items will require a citation that should be listed on the findings page, but some items should be treated as technical assistance. Items that should be treated as technical assistance will be noted on the review form and in the instructions and may not require a corrective action. Technical assistance items should still be documented even though no finding is made.**

## **LICENSE**

**Item 1:** The number of participants that are present at the time of the review should be counted. Based on this number, determine whether the center is within their licensed capacity. Meals may not be claimed if the center is not within the licensed capacity per 7 CFR 226.17(b)(4) (child care centers & 226.19(b)(5) (outside school hours centers). The center contact should be made aware of this regulation and a method put in place to review the center’s claim for reimbursement to ensure the meals are not claimed. If the center is not required to be licensed, or has an exemption, check N/A.

**Item 2:** Items 2 and 3 are not applicable to At Risk After School Care Snack, Outside School Hours Centers, and Emergency Shelters (these centers must obtain a Certificate of Occupancy upon initially opening).

To participate in the CACFP, Federal, state, or local licensing or approval is required for all child care centers, except those centers that participate only as At Risk After School Care Snack, Outside School Hours Centers, and Emergency Shelters.

In order to demonstrate approval by a Federal, State, or local authority, the governing authority must have written standards of criteria by which the child care services are operated and approved. The written standards and approval must be focused on the various aspects of services that will be delivered to the children in care. Simply being in compliance with one aspect of care, such as fire safety or food safety, does not meet the criteria for approval. Therefore, having a fire or food inspection alone would not meet the licensing or approval criteria for participation in the CACFP.

**Item 3:** Child Care Centers that are not licensed by a Federal, State, or local authority must comply with CACFP Child Care Standards and have a current health/sanitation permit or satisfactory report of inspection conducted by local authorities within the past 12 months and a current Certificate of Occupancy.

Centers that are using CACFP Child Care Standards to qualify must use the Bright from the Start Child and Adult Care Food Program Child Care Standards form to conduct an evaluation of their center to assess compliance with the standards. Centers qualifying under the CACFP Child Care Standards must conduct an evaluation at least once a year and ensure compliance to continue participation. Centers must certify compliance with and maintain the Child Care Standards form at the center.

## **CIVIL RIGHTS**

For guidance on civil rights requirements, see FNS Instruction 113-4, Civil Rights Compliance and Enforcement in the Child Care Food Program.

**Item 4:** Self-explanatory.

**Item 5-6:** The center must allow equal access to the program and not discriminate based on race, color, national origin, sex, age, or disability, and reprisal or retaliation for prior civil rights activities. Inquire with administrative staff as to admission criteria. Determine if the admission criteria restrict any individual based on the protected classes. Determine during the review if staff are separating or treating participants differently based on the characteristics listed.

**Item 7:** FNS Instruction 113-1 (XII) (A) requires ethnic and racial data be collected and maintained at the “service delivery point”; therefore, this data must be kept on file at the center. Ensure that the center collects and maintains this data on file.

## PARTICIPANT INFORMATION

**Item 8:** 7 CFR 226.15(n) requires participant households be provided with yearly updates regarding income eligibility standards and program facts for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). WIC information must be distributed at the time of enrollment to households whose children are enrolled for participation in child care programs other than outside school hours and At Risk after school care programs. Posting the information does not fulfill the obligation. Ask the center contact how this information is distributed and verify the procedure while conducting the review if possible.

**Item 9:** Each sponsoring organization must ensure that a sponsor notice is distributed to participant households which contains the information required at 7 CFR 226.16(b)(5). If the sponsor has given the sponsored center responsibility for distributing this information to households, determine the process for distributing the information. Determine if the procedure is adequate to inform households of the program and the center's sponsorship.

**Item 10:** All facilities that participate on the CACFP have two optional systems for charging for CACFP meals, both of which are tied to the Program's free and reduced-price meal policy. These systems are "non-pricing" and "pricing" programs.

When an organization has a pricing program, households can only be charged for the number of meals that are actually served to the enrolled participant. This means that the organization must not charge a household for any meals that the participant was not present to receive. Therefore, the pricing organization must have a system in place to count, record, and charge the household for only those meals that are actually served to the enrolled participant.

Additionally, programs may not charge some participants a separate fee while not charging others in the facility a separate fee for meals. For example, many organizations that have the Georgia Pre-K program are allowed by Pre-K guidelines to charge the Pre-K students a separate charge for meals. However, if the center participates on the CACFP, the center cannot treat and charge differently for different groups within the center. The center must choose to be either a pricing or non-pricing program and apply this system across the entire organization.

If a pricing program, determine if the system is applied consistently across the program and that participants are only charged for meals consumed.

Lastly, determine the method for receiving payment of meals for reduced or paid participants. Does the method prevent identification of those participants that are paying a reduced price or those participants that are not paying for meals? There must be no overt identification of participant's income level.

## CLAIM FOR REIMBURSEMENT VERIFICATION

**Item 11:** The sponsor must ensure that the center is claiming meals only for participants enrolled in the child care center. Enrollment is defined as any child with enrollment records on file who comes and receives a meal at least one day during the month.

**Item 12:** 7 CFR 226.16(d)(4)(ii) requires the sponsoring organization to examine the meal counts recorded by the center for five consecutive days during the current or prior claiming period. Due to the claim payment system, sponsors must review records for a five-day period in the current month, or the sponsor may use the previous month only if the claim for reimbursement hasn't been submitted to DECAL. For each of these days, the reviewer must review the enrollment and attendance on file to determine the number of participants that are enrolled and in attendance. Since outside school hours, At Risk, and emergency shelters are not required to have annually updated enrollment records, if one of these types of centers is being reviewed, the reviewer will only review attendance records.

To conduct the five-day reconciliation, do the following:

1. Evaluate the center's enrollment and attendance records to ensure they are current and accurate.
2. Determine the number of meals claimed by the facility based on the Weekly Menu and Food Service Records.

3. Compare the center's total meal counts to its licensed capacity. The meal counts should not exceed the licensed capacity, except if care is provided in shifts.
4. Compare the center's total enrollment to daily attendance to ensure the number of children in attendance does not exceed the number of children enrolled. If attendance does exceed enrollment for any day or shift (if shift care is provided), determine the source of the error (e.g., inaccurate attendance records, missing enrollment forms etc.)
5. Determine whether the meal counts exceed the number of participants in attendance on any day or any shift.
6. Record the number of participants that were enrolled and in attendance according to the records in the appropriate meal category on the Meal Count Reconciliation Worksheet. (If attendance records are not substantially complete in order to verify meal counts, the facility will need to be cited for not maintaining attendance records as well.).

Based on the attendance/enrollment records, the reviewer should determine if the center documented meals in excess of the attendance/enrollment records. If enrollment records are reviewed and it's found that a child is not noted as normally being present at a certain time, but the child is marked on the attendance record, the reviewer should place this child or children with similar situations in the sample of household contacts to verify enrollment. Additionally, if a substantial amount of meals were documented on the Weekly Menu and Food Service Record that could not be verified by attendance/enrollment records, the sponsoring organization (SO) must take the appropriate steps to make household contacts per Bright from the Start's Household Contact Memo. If upon making household contacts, the SO has reason to believe that the sponsored child care center intended to file a false or fraudulent claim, the SO should take the appropriate steps to conduct follow-up reviews or declare the center seriously deficient (keep in mind household contacts are only applicable to child care centers including Head Starts).

The sponsoring organization must also have a system in place when completing the claim for reimbursement to ensure that only the number of meals that the reviewer has verified through attendance/enrollment records are claimed.

**Item 13:** Regulatory age limits are defined under the definition of "children" in 7 CFR 226. Determine based on the type of program, whether participants are being correctly claimed. When children turn 13 years, they can no longer be claimed on the CACFP unless it is a migrant program or there is documented disability of any child of any age as long as the majority of the children in care are under 18 years of age. Children in the At Risk after School Care may be up to 18 years of age (children that turn 19 years in the At Risk may be claimed throughout the end of the school year).

### **AT RISK AFTER SCHOOL CARE PROGRAM**

**Item 14:** When reviewing the At Risk after School Care program, review and record the activities that are taking place. The center must be providing enrichment or educational activities during the after-school program in order to be eligible for this program. This does not mean that during the after-school program, free time (playground or videos) is not allowed. However, free time should not be the majority of the program agenda. If at the time of the review, educational or enrichment activities are not being conducted, review the agenda that is available for the program. There should be educational, or enrichment activities listed. While there is a wide array of activities that could fall into enrichment or educational activities, the staff at the center must be actively involved in providing these activities. Simply having the students complete their homework while at the program with no involvement from the staff would not qualify the center under this program.

The center should be cited if not providing enrichment or educational activities and given the option to either create an agenda and ensure that staff are trained to provide these activities or to discontinue this program. Facilities that choose to create an agenda should submit the agenda as part of the corrective action.

At the next review, the reviewer should observe the activities that are being conducted. If the center is still not providing these educational or enrichment activities, determine if the center should be designated as seriously deficient for lack of compliance (Administrative Sponsors only).

## RECORDKEEPING

**Item 15:** This item is applicable to child care centers and Head Start centers. Mark “NA” for all other sponsored centers. Determine whether each child enrolled and being claimed for the review month has a complete and current enrollment form. In Georgia the enrollment information can be documented on the Income Eligibility Statement. For those centers that choose not to use the DECAL Income Eligibility Statement for all participants, enrollment information must be on file for these children at the center. If the center uses the IES for all participants, the sponsor should be able to make this determination without reviewing information at the center. If the center does not use the IES form for all participants, review the enrollment information for participants for which the IES was not used to determine if the guidelines for enrollment found at 7 CFR 226.15(e)(2) are being met. Enrollment information must be updated and signed by the parent annually.

**Item 16:** The Weekly Menu and Food Service Record must be used to record actual meals and the number served unless the center has received approval to use an alternate form. Review the Weekly Menu and Food Service Record for the current month (or the prior month if the review is being conducted at the beginning of the month) to ensure that the center is documenting this form on a daily basis. All records should be up to date to the day of the review.

**Item 17:** Does the center have a procedure in place to submit records to the sponsor in a timely manner according to the agreement with the center? If not, provide technical assistance to the center to ensure records are submitted so that claims for reimbursements are not delayed.

**Item 18:** Each sponsored center must maintain all records to support the claim for reimbursement per 226.10(d) for three years after the date of submission of the final claim for reimbursement for that fiscal year. Determine where and if the center’s procedures for maintaining these records are meeting the requirements.

**Item 19:** 7 CFR Section 226.15(e)(6) requires each institution to maintain copies of invoices, receipts or other records to document: (i) administrative costs claimed by the institution; and (ii) operating costs claimed by the institution. Bright from the Start CACFP policy 26 also requires sponsored facilities to maintain these records.

If the center being reviewed is under an administrative sponsor, each center must be maintaining the Monthly Record of Costs form. The reviewer for the administrative sponsor should review both of these forms for any prior month for which costs have been claimed. Determine if the organization is documenting each charge to the CACFP and has all receipts to support the costs. Based on the amount of the reimbursement received, determine if the center has an excess balance of CACFP funds. If there is an excess balance of funds, the center must be cited, and the center should provide corrective action as to how the excess funds will be used to enhance the food program. If the center does not have receipts to support the costs charged to the CACFP, the center as part of the corrective action must be required to pay the food service account back in the amount of the costs that were not supported by receipts, invoices, or applicable supporting documentation.

If the center being reviewed is under a center sponsor, and the center is not required to maintain the receipts or the applicable forms, but this is the responsibility of the sponsor, note that this item is not applicable to the center by checking NA.

**Item 20:** Both administrative sponsors and center sponsors should review this item. However, under a center sponsor, a center will not likely be cited as it is the sponsor’s responsibility to ensure that administrative costs for the sponsor and all its sponsored facilities do not exceed 15% and are correctly charged. While reviewing this information, if the center sponsor finds that administrative costs were claimed in excess of 15% of the reimbursement, the sponsor should take action to correct this item. To correct this item, an adjustment may need to be made to the financial records to use CACFP funds to pay for allowable operating costs that were not previously claimed, or funds would need to be repaid to the CACFP account if there are no other allowable operating costs.

For centers under an administrative sponsor, the sponsor must ensure that their administrative costs and any administrative costs that the center pays with CACFP funds do not exceed 15% of the reimbursement for that center. If the sponsored center is performing any administrative duties, the center is allowed to claim these costs, and costs should be indicated on the “Budget for Sponsored Center” form. In order for the sponsor to be charging

the maximum amount, 15% of the center's reimbursement, the center should be performing the bare minimum of administrative duties, which should include the documentation of the Weekly Menu and Food Service Records and documentation of the Monthly Record of Costs Form along with ensuring that all receipts or applicable supporting documentation for expenses are available to support charges to the CACFP.

If administrative costs charged by the sponsored center do not coincide with the "Budget for Sponsored Center, the center should be provided technical assistance and corrective action will be required. If there were allowable operating costs that were not claimed by the sponsored center, the center can make an adjustment to the financial records to reassign the costs paid with CACFP reimbursement to allowable operating costs, or the administrative sponsor will need to adjust the amount of administrative fee deducted from the center.

**Item 21:** FNS Instruction 796-2 Rev. 4 provides the guidance on allowable costs that can be paid with CACFP reimbursement. There are 39 cost categories listed in the FNS Instruction. Be aware the cost categories in the instruction do not always match the cost categories that are listed on the Monthly Record of Costs forms or budgets. You may have to review the instruction or use the index in the back of the instruction to locate a cost. After each cost category, requirements may be listed concerning documentation to support that cost.

Some cost items must have prior or specific prior approval in order to claim the cost. These cost items can be found on the Bright from the Start website. Typical costs such as food, labor, rent, utilities do not require prior approval. However, if the center is claiming costs that require prior approval, and a budget was not submitted to the sponsor to approve, the center must be cited.

Review the costs and determine whether only allowable costs are being claimed. If receipts show foods were charged that are not creditable food items, the costs cannot be claimed on the CACFP and the cost of these items would have to be repaid back to the center's food program account. The center does not have to repay money to Bright from the Start, but corrective action must include crediting their food program account in the amount of the costs they claimed that were not allowable.

**Item 22:** For centers under a center sponsor, this may not be applicable as it is the sponsor's responsibility to ensure that requirements are being met. If this is the case, check NA for this item.

FNS Instruction 796-2 Rev. 4 provides the guidance as to proration of costs. Section VII A.3 I indicate that the cost must be properly allocated so that only the allowable share of the cost is assigned to the program.

If an item is not used exclusively for the operation of the CACFP, then the item must be prorated according to the benefit the CACFP receives for an item. The item being charged will dictate how the item is to be prorated. The most common items that are prorated are utilities, rent, and labor.

The FNS Instruction provides the guidelines for prorating rental costs and utilities.

Review to ensure the following guidelines are being met:

- The organization must have proration methods to support their charges to the CACFP.
- The proration method should show the formula that is used to derive the cost charged. Not having a documented proration method on file, and simply guessing would not be sufficient.
- A proration method should be very specific. For example, if the organization is charging utilities for the kitchen, the proration method should show the square footage of the kitchen divided by the total square footage of the building. The actual amounts of the square footage should be listed. A proration method for utilities might look like this:

$$100 \text{ sq. ft. kitchen} / 1000 \text{ sq. ft. total building} = .10 \text{ or } 10\%.$$

Simply having 10% listed as the charge to CACFP is not acceptable without the supporting proration method on file.

- For those proration methods that are only based on square footage and that remain the same each month, it would not be necessary for the organization to “rewrite” the proration method each month, as long as one is on file.
- For those items that change each month, such as the amount of time someone might spend performing administrative duties, a proration method would need to be documented and on file for each month that costs are charged to the CACFP.

Do the following to ensure costs are being properly charged.

- Review the items that are being charged to the CACFP. Items such as utilities, rent, or any item that would not be solely for the CACFP should trigger a review.
- Review each proration method to determine that the proper formula is used.
- If necessary, measure the area that is being charged to ensure that the proper square footage of the area was derived or ask for some documentation that shows the square footage.
- Perform the mathematical equation to determine if the correct percentage is being charged.

**Item 23:** Bright from the Start Policy Memo entitled Labor Cost Documentation dated May 23, 2005 allows organizations to combine labor cost forms in certain situations. If the center is using the guidance in the policy memo, ensure compliance with the memo.

Otherwise both time and attendance and a time distribution report must be maintained and the instructions in FNS Instruction 796-2 Rev. 4 Section VIII I 23 c must be followed.

FNS Instruction 796-2 Rev. 4 requires that time and attendance, time distribution reports, and compensation plans be on file for any labor costs charged to the CACFP. Section VIII I 23 c specifically lists the documentation requirements to charge labor costs.

## TRAINING

**Items 24:** Sponsors are required to conduct training annually to key staff at each center and key staff must attend the training. Bright from the Start has defined “key staff” at sponsored facilities as the individuals that are responsible for the operation of the CACFP at the center. Determine whether the person(s) responsible for the CACFP has received training. If this individual(s) is new, training must be provided to this person(s) by the sponsoring organization in some form. If the key staff has failed to attend the annual training after being given more than one option to attend, the center must be declared seriously deficient.

### Item 25:

Based on the training provided, determine if the center is implementing the topics that were discussed. If training topics included regulatory requirements that must be implemented, the center must be cited for any failure to implement. If training topics included discretionary items, technical assistance should be provided.

## OTHER REQUIREMENTS

**Item 26:** The sponsored center should be provided with program guidance concerning the CACFP and the sponsoring organizations procedures. Determine if this information is maintained at the center and available to the staff persons performing CACFP duties. If the answer is no, provide technical assistance to the center and/or provide the documents that should be on file for reference.

**Item 27:** In preparation for the current visit, the last review should be examined. Determine if any findings that were cited during the last review are corrected. Findings for the individual items not corrected must be made. Determine the severity and the frequency of the repeat findings. If an administrative sponsor, determine if the center should be declared seriously deficient and follow that procedure.

## FOOD HANDLING/SANITATION AND FOOD STORAGE

**Items 28-45:** Determine if reasonable health, safety and sanitary conditions exist in the center. Any serious health and/or safety and/or sanitation problem(s) should be discussed with the staff and brought to the attention of the appropriate local and/or State agencies (if applicable).

### OBSERVATION OF MEAL SERVICE

Document the meal observed and the number of participants present in the 1-12 yrs. age range, the number of infants' present, and/or the number participating in the At-Risk program.

Record the food items that were served under the food item column and the serving sizes under the applicable age range. In the lower table, infant meals should be recorded for all centers that enroll infants.

**Item 46:** Compare food items served on the day of review to the written menu prepared by the center. Menus should accurately reflect which food items were served to meet the meal pattern requirements. Menu substitutions should be appropriate and recorded on the menu. While this item should be not a finding, technical assistance should be provided.

**Item 47:** Observe and determine if the meal contains all the required components. For further guidance on meal pattern requirements, refer to 7 CFR 226.20 and the Food Crediting Guide.

**Item 48:** The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, requires that milk served in the CACFP is consistent with the most recent version of the Dietary Guidelines for Americans. **The 2017 Updated Meal Pattern Requirements recommend that children two-five years of age consume fat-free (skim) or low fat (1%) fluid milk; and unflavored low-fat, unflavored fat-free, or flavored fat-free milk be served to children 6 years old and older. Unflavored whole milk must be served to 1-year old children. Whole milk and reduced-fat (2%) milk may not be served to participants over two years of age.** Additionally, parents and guardians may now request in writing non-dairy substitution that meets the nutritional standards for fortification of calcium, protein, vitamin A, vitamin D, and other nutrients found in cow's milk without providing a medical statement. Such substitution is at the option and the expense of the facility. The requirement for participants who have a medical disability and who submit a medical statement signed by a licensed physician remains unchanged.

**Item 49:** Observe and determine that the required components were prepared and served in sufficient quantities. The meal service may be pre-plated or family-style. For further guidance on family-style meal service in the Child and Adult Care Food Program, see FNS Instruction 783-9, Rev. 2, Family Style Meal Service in the Child and Adult Care Food Program.

**Item 50:** Observe the meal counts taken and recorded on the Weekly Menu and Food Service Record forms. An accurate system is based on an actual count of participants served and must consistently yield correct results. Examples of meal count methods that are NOT accurate are plate counts, use of enrollment/attendance data for meal count, other figures derived from enrollment and/or attendance data, etc. Counts must be taken at the time of service or directly after the service of the meal. Determine if an appropriate count is being taken.

**Item 51:** While adult staff persons may eat with enrolled participants, and these "non-program" adults must be recorded on the Weekly Menu and Food Service Record forms, they cannot be claimed for reimbursement. If the center serves "non-program" adults, determine if the organization is recording this information on the Weekly Menu and Food Service form and ensure these adults are not being claimed on the claim for reimbursement.

**Item 52:** Meals served to participants should incorporate a combination of colors, temperatures, textures, shapes, sizes, and flavors. If the answer to this item is "NO," provide technical assistance to encourage variety and enhance eye-appeal of meals. For further guidance for child care centers, check out the information at the following website address: <http://www.fns.usda.gov/cnd/Care/Publications/tools.htm>

**Item 53:** A positive and pleasant meal environment promotes good eating habits for children. If the answer to the question is "NO," provide technical assistance to encourage the center to create a more pleasant meal environment.



**Item 54:** All child care centers that enroll infants must offer formula to infant households that are enrolled participants. Per Bright from the Start Policy Memo entitled “Infant Meals” dated July 7, 2005, it’s recommended that an affidavit be on file to support the parent’s choice to supply formula. If the affidavit is not used, some other method of documenting compliance must be on file. Review the procedures for offering formula and/or review documentation to support the center’s procedure.

**Item 55:** Infant meals consisting solely of food provided by parents are NOT reimbursable unless the pattern only includes formula/breast milk for that meal (per USDA policy memo 226.20-28 and Bright from the Start Memo dated 7-7-05). 7 CFR 226.20 (b)(2) requires centers and day care homes to offer at least one type of iron-fortified infant formula. Updated CACFP USDA policy memo CACFP 02-2018 on Feeding Infants and Meal Pattern Requirements requires the center or day care home to supply all the other required food components in order for the meal to be reimbursable when a parent or guardian chooses to provide breastmilk or a credible infant formula when their infant is consuming solid foods.

**Item 56:** Modifications in the meal pattern for medical or special dietary reasons must be accompanied by a signed statement obtained from a recognized medical authority. For further guidance on menu substitutions, see FNS Instruction 783-2, Rev. 2 Meal Substitutions for Medical or Other Special Dietary Reasons.

**Item 57:** The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, requires child care centers, family day care homes, at-risk afterschool programs and emergency shelters participating in CACFP to make drinking water available to children, as nutritionally appropriate. Throughout the day, including at meal times, water should be made available to children to drink upon their request, but does not have to be available for children to self-serve. While drinking water must be made available to children during meal times, it is not part of the reimbursable meal and may not be served in lieu of fluid milk. Water may not be served in lieu of liquid milk or fluid item for snack, however if two non-fluid items are served for snack water should be offered in addition to those items. Please note, that the purchase of water will continue to be an unallowable cost, unless in extreme circumstances where safe water is not readily available in a facility.

**Item 58:** Review the Weekly Menu and Food Service Records for the five previous operating days. If there is a difference between the number of children in care at the time of the meal service and the number of children documented on the Weekly Menu and Food Service Records for the previous five days, inquire with the Center Contact regarding the reason for the discrepancy. Attempt to confirm the explanation if possible (for example, reviewing documents to confirm a field trip if that explanation is provided). If the Center Contact cannot provide a valid and reasonable explanation for the discrepancy and the difference is 20% or more, household contacts will be required. Review the memo for conducting Household Contact Procedures. Household contacts will determine, when applicable, if a disallowance will be implemented. If the Center contact/center staff can provide a valid and reasonable explanation, document the explanation.